Topics for Off-road Frequently Asked Questions (FAQ) and On-line Guidance Documents

Applicability

Which vehicles are covered by the off-road regulation, and how are those vehicles affected? Discuss:

1. On-road vehicles
2. Portable/stationary equipment
3. Off-road vehicles used by agricultural/logging industries
4. Exempt off-road vehicles (snow removal/emergency)
5. Off-shore vehicles
6. Off-road vehicles owned by training facilities
7. Workover rigs
8. Cranes/two engine vehicles
9. Personal use off-road vehicles
10. Off-road vehicles operated on Native American reservations
11. Job Corps off-road vehicles
12. Vehicles awaiting sale
13. Two-engine scrapers

Fleet definition

How do you determine fleet size, and what does it mean to a sub-fleet or parent fleet? Discuss:

1. Sub-fleet/parent fleet determination
2. Public fleet divisions
3. Reporting/compliance as a sub-fleet
4. Total horsepower used to determine fleet size
5. Municipal fleets in low population counties
6. Non-profits
7. Non-profit training facilities
8. State/federal fleets
9. Captive area attainment fleets
10. Types of ownership
11. Common control

Engine issues and Tier determination

How do you determine the Tier level of an engine? Discuss:

1. Off-road Tier levels
2. Flexibility engines, Average Banking and Trading engines, Consent Degree engines (engines certified early to a standard)
3. Tier 1 Uncontrolled engines
4. Tier 4 Interim engines

Emission Factors

What emission factors should be used? Discuss:
1. PM/NOx emission factors for on- and off-road engines
2. Alternative fuel emission factors
3. How to reflect exhaust retrofits

Horsepower (Hp)

What hp should be used? Discuss:
1. Hp used for fleet average calculations
2. Hp used when replacing a diesel vehicle with another vehicle (electric, stationary, portable, alternative fuel)
3. Engines with multiple horsepower listed

VDECS

What are VDECS? Discuss:
1. Level 1, 2, and 3 for PM
2. Highest level VDECS
3. NOx VDECS
4. Safety provisions [*]
5. Appeals procedure
6. Verification
7. Early credit
8. Feasibility
9. Experimental VDECS
10. Getting credit for use of a non-verified VDECS
11. Fuel based VDECS

Early credit

What early credit can be earned? Discuss:
1. Repower early credit
2. Turnover early credit
3. PM VDECS early credit
4. NOx VDECS early credit
5. Using early credit
6. Recordkeeping required to claim credit

Compliance options

Should I meet the fleet averages or BACT requirements? Discuss:
1. Small/medium/large compliance requirements
2. Compliance dates
3. Choosing between the fleet average target and BACT requirements
4. Switching between the fleet average target and BACT requirements year to year
5. Captive attainment area fleet compliance

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[*] Due to the large amount of material covered by this category, a separate VDECS safety guidance document will be developed in addition to the information provided in the FAQ.

6. Low population municipal fleet compliance
7. Compliance options for new fleets
8. Compliance options for out-of-state fleets
9. Meeting NOx compliance first

Fleet average calculations

How are the fleet averages calculated? Discuss:
1. PM/NOx fleet average/target equations
2. Using the hours provision

NOx BACT requirements

What are the NOx BACT requirements? Discuss:
1. Turnover
2. Replacement
3. Replacement with alternative fuels/stationary/portable systems
4. Retirement
5. Repowers
6. Rebuild to a higher emission standard
7. Designate as low use
8. NOx VDECS
9. Exemption for vehicles less than 10 years-old, specialty vehicles, and vehicles that have installed a PM VDECS within the last 6 years
10. Extension for manufacturer delays; Tier 3 and 4 delays
11. Delay of Tier 1 turnover
12. Rounding

NOx fleet average targets

How do you meet the NOx fleet average targets?

PM BACT requirements

What are the PM BACT requirements? Discuss
1. PM VDECS
2. Replacement with Tier 4/4I/alternative fuel vehicles
3. Tier 0 retirement for a shrinking fleet
4. PM carryover credit
5. Used PM VDECS
6. Exemptions for vehicles less than 5 years old, specialty vehicles, vehicles with VDECS which were the highest level at the time of install, and vehicles for which there is no VDECS available
7. Extensions for manufacturers delays

PM fleet average targets

How do you meet the PM fleet average targets?

Fines for non-compliance with the off-road regulation
Discuss:
1. What are the fines
2. Where does the fine money go

Rental/Leasing companies
How are leased/rental vehicles accounted for in the regulation? Discuss:
1. Adding rental/leased vehicles to a fleet
2. Returning rental/leased vehicles to fleet owners (lessor)
3. BACT turnover credit for renter/lessee/lessor
4. Fleet responsible for vehicle upgrades
5. Idling – who is responsible

Out-of-State fleets
How does an out-of-state fleet comply with the regulation? Discuss:
1. Compliance options
2. Reporting
3. Labeling
4. Low-use provisions

Adding vehicles
Can you add vehicles during the regulation?
1. BACT path vs. fleet average additions

New fleets
How do new fleets comply with the regulation?

Low use vehicles
What is the low use provision? Discuss:
1. Low use threshold
2. Non-resettable hour meter
3. Vehicles used outside California
4. Emergency use hours
5. Three year rolling average
6. Low use designation as turnover
7. Bringing a vehicle out of low use status

Specialty vehicles
What are specialty vehicles? Discuss:
1. Definition of specialty vehicles
2. Applying for specialty designation from ARB Executive officer
3. Exemptions for specialty vehicles

Changing fleet size
What happens if a fleet changes size categories? Discuss:
1. Growing a fleet size
2. Shrinking a fleet size

Reporting
What reports are required? Discuss:
1. Initial reporting
2. Dates for each fleet size
3. Information required
4. Reporting requirements after first compliance date
5. Adding a vehicle to the fleet
6. Reporting as a new fleet after initial reporting

Labeling
What labeling is required? Discuss:
1. Getting EINs early
2. ARB issued EIN
3. Size and color
4. When a fleet will receive the EIN
5. When the EIN must be on a vehicle
6. Labeling added vehicles
7. What if I cannot label my vehicle as directed?

Recordkeeping
What records must be kept? Discuss:
1. Records that must be kept
2. Length of time records must be kept

Surplus Off-road Opt-in for NOx (SOON) program
What is the SOON program? Discuss:
1. Goals of program
2. District opt-in
3. ARB requirements vs. Air district requirements
4. Fleet reporting requirements
5. Compliance planning requirements
6. SOON interaction with the off-road regulation
7. Funding used for the SOON program
8. When am I required to apply for SOON funding?

Funding
What funding is available? Discuss:
1. Carl Moyer program interactions with off-road regulation
2. Carl Moyer funding for small/medium/large fleets
3. Loan pilot program

Idling requirements

What are the idling requirements for the regulation? Discuss:

1. When requirements begin
2. Idling policy required
3. Who is responsible – owner or operator

Please email FAQ suggestions/topics/questions to Elizabeth Yura at eyura@arb.ca.gov